

CHART OF ARROWOOD INDEMNITY COMPANY'S DEPOSITION DESIGNATIONS

Deponent	Pages and Lines	Brief Summary†	Objections	Responses to Objections	Plan Proponents' Current Position	Counter Designations
Hughes (June 11, 2009 Deposition)	p. 361, 1.22 to p. 378, 1.24	Grace and Arrowood reject BNSF's claims for coverage for asbestos related claims under the Zonolite policies	None (admitted for all purposes on Sept. 15, 2009)	None	None	

† The "Brief Summary" is not intended to be an exhaustive list of issues as which the testimony relates. For a more complete and accurate understanding, please see the designated testimony.

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Deponent	Pages and Lines	Brief Summary†	Objections	Responses to Objections	Plan Proponents' Current Position	Counter Designations
Posner (May 6, 2009 Deposition)	p. 144, 1.22 to p. 149, 1.23	Grace did not make any claims for coverage for asbestos related claims under Zonolite policies after the 1995 Settlement Agreement	None (Admitted for all purposes on Sept. 11, 2009)	None	None	
Posner (May 6, 2009 Deposition)	p. 308, 1.8 to p. 314, 1.7	The 1995 Settlement was the result of good faith, arm's length negotiations	None (Admitted for all purposes on Sept. 11, 2009)	None	None	
Posner (May 6, 2009 Deposition)	p. 334, 1.11 to p. 337, 1.21	The 1994 Settlement was the result of good faith arm's length negotiations	None (Admitted for all purposes on Sept. 11, 2009)	None	None	

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